

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. (ALEX) JONES, et al.,

Defendants.

No. 3:18-cv-00017-NKM-JCH

**STIPULATED DISMISSAL**

WHEREAS, Plaintiff Brennan Gilmore (“Gilmore”) sued Defendant Lee Ann Fleissner a/k/a “Lee Ann McAdoo” (“McAdoo”) for defamation;

WHEREAS, Gilmore and McAdoo desire to amicably resolve all claims arising out of this action;

WHEREAS, Gilmore and McAdoo having entered into a settlement agreement, hereby stipulate as set forth below to the entry of an order in this action:

IT IS ORDERED, ADJUDGED, AND DECREED as follows:

1. Gilmore and McAdoo agree that this Court will retain jurisdiction to enforce the terms of the parties’ settlement agreement and to enforce and resolve any disputes related thereto, if necessary.

2. This action and all defenses thereto with respect to Gilmore and McAdoo are hereby dismissed with prejudice and without costs, disbursements, or attorneys’ fees to any party.

/s/ Hassen A. Sayeed

Jonathan Hacker, admitted *pro hac vice*  
D. Sean Trainor, (VSB #43260)  
Anwar L. Graves, admitted *pro hac vice*  
Rahul Kohli, admitted *pro hac vice* Kendall  
Collins, admitted *pro hac vice*  
O'MELVENY & MYERS LLP  
1625 Eye Street, N.W.  
Washington, D.C. 20006  
Telephone: (202) 383-5300  
Facsimile: (202) 383-5414  
jhacker@omm.com  
dstrainor@omm.com  
agraves@omm.com  
rkohli@omm.com  
kcollins@omm.com

Hassen A. Sayeed, admitted *pro hac vice*  
Chani C. Gatto-Bradshaw, admitted *pro hac vice*  
James Yi Li, admitted *pro hac vice*  
O'MELVENY & MYERS LLP  
Times Square Tower 7  
Times Square  
New York, New York 10036  
Telephone: (212) 326-2000  
Facsimile: (212) 326-2061  
hsayeed@omm.com  
cgatto-bradshaw@omm.com  
jli@omm.com

Kimya Saied, admitted *pro hac vice*  
O'MELVENY & MYERS LLP  
Two Embarcadero Center  
28th Floor  
San Francisco, CA 94111-3823  
Telephone: (415) 984-8700  
Facsimile: (415) 984-8701  
ksaied@omm.com

s/ David S. Wachen

David S. Wachen (VSB # 96363)  
WACHEN LLC  
11605 Montague Court  
Potomac, MD 20854  
(240) 292-9121  
Fax (301) 259-3846  
david@wachenlaw.com

*Counsel for Lee Ann Fleissner a/k/a*  
*"Lee Ann McAdoo"*

Aderson Francois, admitted *pro hac vice*  
CIVIL RIGHTS CLINIC GEORGETOWN  
UNIVERSITY LAW CENTER  
600 New Jersey Avenue, N.W.  
Washington, D.C. 20001  
Telephone: (202) 662-9065  
Aderson.Francois@georgetown.edu

Elizabeth B. Wydra, admitted *pro hac vice*  
Brianne J. Gorod, admitted *pro hac vice*  
CONSTITUTIONAL ACCOUNTABILITY  
CENTER  
1200 18th Street, N.W., Suite 501  
Washington, D.C. 20036  
Telephone: (202) 296-6889  
elizabeth@theusconstitution.org  
brianne@theusconstitution.org

*Attorneys for Plaintiff*

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2022.

---

NORMAN K. MOON  
SENIOR UNITED STATES DISTRICT JUDGE